MASELLI WARREN, P.C. By: Paul J. Maselli, Esquire 600 Alexander Road Suite 3-4A Princeton, NJ 08540 Attorneys for Debtor-in-Possession PM 4853 (609) 452-8411

In Re:

NASSAU TOWER REALTY, LLC, A New Jersey Limited Liability Company,

Debtor

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Case No. 13-24984(MBK)

Chapter 11

**Oral Argument Requested** 

NOTICE OF MOTION TO SELL REAL ESTATE FREE AND CLEAR OF LIENS AND FOR OTHER RELIEF

To: All parties on attached service list

PLEASE TAKE NOTICE that the undersigned attorneys for Nassau Tower Realty, LLC, the Debtor and the Debtor-in-Possession herein, shall move before the above-named court on June 30, 2014 at 10:00 am or as soon as counsel may be heard, a copy of which is provided along with this Notice, for an order pursuant to 11 USC §363 and §105 authorizing the sale of real estate which is property of the bankruptcy estate, upon the grounds set forth in the attached certification. A proposed form of order is provided. Oral argument is requested.

MASELLI WARREN, P.C. Attorneys for the Debtor/Debtor-in-Possession

Dated: 6.6.14 By: <u>/s/ Paul J. Maselli</u>

PAUL J. MASELLI

## SERVICE LIST

Santander Bank, NA, Attn: Michael Caruso, 1 Boland Dr., West Orange, NJ 07052

Santander Bank c/o Robert E Nies, Esquire, Wolff and Samson, PC, One Boland Dr., West Orange, NJ 07052

United States Trustee One Newark Center, Suite 2100 Newark, NJ 07102